

IN THE DRAWINGS:

(10/10/04)

Regarding Examiner's objection to the drawings due to an omitted discussion of certain reference steps in Figs. 1A and 1B, it should be indicated as follows:

In Fig. 1A, Applicants have now added into the specification, a description of step (F5Y).

In Fig. 1B, Applications have now added into the specification, a description of the step (F14).

In regard to step (F16N) in Fig. 1B, it should be indicated that this particular step feature was actually described and shown on page 30, lines 13 of the original specification.

It should now be understood that the drawing corrections have been taken care of by the added descriptions in the specification.

## REMARKS

In response to the Examiner's Office Action of September 20, 2004, Applicants are herein presenting their considerations and arguments on the elements involved.

The objections to the drawings have now been handled by the insertion into the specification of indication of the various steps that Examiner has indicated were omitted.

The Examiner has rejected the original claims 1-13, under 35 USC 102(b), as being anticipated by the Bhat U.S. Patent 5,668,995. Applicants would now herein traverse Examiner's contention that the Bhat reference could anticipate the claims of Applicants.

In a certain sense, the Bhat reference does relate to a similar field of operations to that of Applicants, in that Bhat involves a capacity planning system for multi-processor computer systems used in client-server environments.

It will be noted in Fig. 2A of Bhat, there is a menu list of various steps of calculations to be used for determining parametric requirements for aspects of a client server network. However, there is nothing there which indicates Applicants' focus which involves a method for establishing the memory requirements for the Server Farm configuration.

Further, Fig. 2A and 2B of Bhat are merely generalized steps, with no detailed implementation, which the Bhat reference indicates should be done, but with no actual details as to how each of these particular items are accomplished, and how they are integrated into the overall system ---- with the emphasis on disk space involved, but no emphasis or specific calculations for the total memory requirements that would be involved, as is done in Applicants' Thin Client Sizing Tool which uses an Application Delivery Configurator.

Thus, there is no way that the Bhat reference can teach the substance of establishing memory requirements for a Server Farm configuration, as is specifically detailed and claimed in Applicants' amended claims. It will be noted that Applicants' original claim 1 has now been combined with the original claim 3 to indicate an amended claim 1, where Applicants in clause (a), calculate, via said Application Solution Delivery Configurator, the memory requirements for each user-type using each application available, plus they included a series of steps in claims (a1), (a2) and (a3). Here, these factors include utilizing information from a Configuration Session Database to enable the Application Solution Delivery Configurator to determine the number of servers required for the optimum server configuration --- and further, to calculate the memory requirements for each server using information from said Sizing Database and said Configuration Database.

These operations and claim items are not shown or taught in the Bhat reference.

Further discussion will be made in regard to the amended claim 1. Here, it should be noted that the preamble of claim 1 poses a setting which is not typical or useable in the Bhat configuration.

Now in regard to claim 1, clause (a): calculating, via said Application Solution Delivery Configurator, the memory requirements for each user-type utilizing each application available. --- Here, the Examiner has cited the Bhat Abstract, and also column 1, lines 55-67 of the Bhat reference.

Now, while Bhat discusses in the Abstract, the generalized statement as to "the amount of memory required" and again mentions "the amount of memory required" at column 1, line 64 --- these are mere generalized statements which have no particular implementation, such as is detailed and discussed in Applicants' specification and drawings.

In amended claim 1(a): accessing from said Sizing Database, the memory requirements for each application being utilized ---

Here, Examiner has cited the Bhat reference, column 3, lines 1-5, et seq: Here, it should be noted at this portion of column 3, Bhat gives a list of things that should be done, but there is nothing which indicates the amount of memory, nor how the amount of memory could be calculated for the client-server environments.

At column 3, line 29, Bhat mentions "the amount of memory required", but this is again a mere generalized statement with no specific methods of calculation as to how this is to be done. --- And note, that Applicants' claims and specification provide specific steps by which the memory requirements are to be calculated.

In regard to amended claim 1 (a2): Incrementing the memory requirements by adding the product of the MAX FUNCTION times the number of users . . . .

Here, the Examiner has cited the Bhat reference, column 3, lines 25-28. All Bhat does here is make some generalized statements regarding his invention performs a set of calculations contained the mathematical model [??WHAT MATHEMATICAL MODEL - NO MATHEMATICAL MODEL IS PROVIDED BY BHAT??] to provide the following outputs: the recommended model of multi-processor computer system, the number of processors needed in the server, the amount of memory required and the configuration of a disk subsystem suitable for the system . . . .

As will be noted, there is no teaching in the Bhat statements which would cover the elements in clause (a2) of claim 1, which involves incrementing memory requirements by

adding the product of the MAX FUNCTION times  
the number of users . . . .

In regard to amended claim 1(b): -- utilizing  
information from said Configuration Session Database to enable  
said Application Solution Delivery Configurator to determine the  
number of servers required for the optimum server configuration.

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Here, the Examiner has cited the Bhat Fig. 2A, block  
46, and also Bhat column 1, lines 63-64. --- Here, we  
should note that the Bhat Fig. 2A, item 26 is merely a  
generalized block stating "prompt for user  
specifications". This teaches nothing.

Then, the Bhat column 1, lines 63-64 merely states the  
number of processors needed in the system, the amount  
of memory required . . . . It should be noted that  
this does not teach Applicants' clause (b) of claim 1,  
which involves utilizing the number of servers required  
for the optimum server configuration.

Now, in regard to the amended claim 1(c): --  
calculating the memory requirements for each server using  
information from said Sizing Database and said Configuration  
Database. ---

Here, the Examiner has cited Bhat, column 3, lines 5-  
12, which discusses an optimum configuration of a  
multi-processor computer system as a solution . . .  
accepts inputs for a specific client server environment  
such as the number of users, the amount of disk storage  
required, the average number of transactions per second  
per user, average input data size per transaction,  
average output data size per transaction, average  
processor service time per transaction, average number  
of disk accesses per transaction. . . .

There is nothing here which would indicate how one would calculate memory requirements for each server.

Further, in regard to clause (c), Examiner has cited column 3, lines 1-15, which again, are nothing but a few statements of desirable generalities of information.

Then, Examiner cites column 1, lines 64-67 of Bhat, which indicates the number of processors needed in the system, the amount of memory required and the configuration of a disk subsystem suitable for the system . . . . Nothing is taught here as to using a Sizing Database or a Configuration Database to help calculate the memory requirements for each server.

In regard to Applicants' amended claim 4(a1a) and (a1b): --- Here, it should be noted that Examiner's citation of the Bhat reference, column 3, lines 1-6 and column 3, lines 40-55 --- certainly do not teach any matter or form for addressing the situation of applications which are MS-DOS or 16-bit oriented with the results that the memory is incremented by 25% over what memory has been allocated for each application by the operating system involved.

In regard to Applicants' amended claim 5, none of the Bhat references to columns 3 and 4 specifically teach the various elements involved in Applicants' claim 5, as for example, in clause (c5): -- querying to see if the individual server memory requirement is less than 100 MB. --- This, of course, is not taught or shown in the Bhat reference, as also is no implementation for the other of Applicants' clauses.

Here again, it should be emphasized and reiterated that Applicants show an actual "implementation" for each of the elements involved in their configuration, as witness Applicants' Figs. 1A, 1B and 2.

There is no specific "implementation" provided in the Bhat reference which gives the detailed calculations and technology of how these calculations are to be accomplished.

Likewise, regarding Applicants' claims 7, 8, and 9, there is no information in column 3, lines 39-50 of Bhat, which indicates the substance of (c3a) for dividing the total server memory required for the optimal configuration by the total number of servers involved.

Likewise, there is nothing in Bhat column 3, lines 29-35 or column 3, lines 1-15, which indicates Applicants' clauses (c4a) and (c4b) which involves incrementing the memory requirement for each server by 64 MB.

In regard to Applicants' amended claim 9, it will be seen that the Examiner's reference to Bhat column 3, lines 25-30 certainly do not teach or indicate Applicants' clause (c5a): -- querying to see if the individual server memory requirement is equal to or greater than 1,000 MB --- nor does Bhat teach any factor on clause 5(c): -- for establishing a total memory requirement TM as the smallest number, Nm, of either Ox (maximum amount of operating system memory) or Oy (maximum server memory required).

In regard to Applicants' amended claim 10, the Examiner has cited certain lines from the Bhat reference, column 1, column 3, column 5, and columns 15-30 (note that no such columns exist in Bhat) --- and here, it can easily be noted that there is no teaching in Bhat of a server information database means, or for a Sizing Database means, for a Configuration Database Template means, for a Configuration Session Database means, or for an Application Delivery Solution Configuration means.

There is no way that these citations which the Examiner made to the Bhat reference can possibly cover or teach the configuration and operation of Applicants' system.

Likewise, the same situation arises in regard to claims 11, 12 and 13, where none of the Bhat citations could teach the elements shown in claims 11, 12 and 13, which are very specific to the situation developed by Applicants' invention.

It should be emphasized that Applicants provide a methodology whereby each operating system in a configured optimal Server Farm is correlated to each user-type, and this is correlated to each application, which then are increased by the number of particular user-types and the number of applications involved in order to establish the total memory requirements for a Server Farm or Metafarm.

Thus, while the Bhat reference is focused on a very similar type of operation, the Bhat reference has not actually implemented the actual calculations required and the detailed steps necessary to accomplish the proper memory requirements for the various elements in the optimally configured Server Farm network.

In this regard, it should be understood that the invention should be regarded as a whole in its entirety, and not a mere situation of one or two accumulated parts which may possibly have been addressed by other prior art.

With the amendments to the specification and the amendments to the claims, plus the overall look at the claims as a whole in their entirety, it is now respectfully requested that



the Examiner observe the entirety of Applicants' configuration in the claims and subsequently provide a timely Notice of Allowance therefor.

Respectfully submitted,

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Date:

December 15, 2004

Patti S. Preddy

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